

Naranjo, Eugenia

From: Naranjo, Eugenia
Sent: Tuesday, June 16, 2020 11:53 AM
To: Thompson, Carlie T; Nace, Charles; Warner, Leonard
Cc: Franklin, Elizabeth A NWK; Castro, Enrique M
Subject: RE: Diamond Alkali NBSA BERA back-check comments

Thank you Carlie, we are OK with the proposed language for the revised BERA.

eugenia

From: Thompson, Carlie T <Carlie_Thompson@oxy.com>
Sent: Monday, June 15, 2020 6:23 PM
To: Naranjo, Eugenia <Naranjo.Eugenia@epa.gov>; Nace, Charles <Nace.Charles@epa.gov>; Warner, Leonard <len.warner@wsp.com>
Cc: Franklin, Elizabeth A NWK <Elizabeth.A.Franklin@usace.army.mil>; Castro, Enrique M <Enrique_Castro@oxy.com>
Subject: RE: Diamond Alkali NBSA BERA back-check comments

Eugenia,

To address comment 3 of EPA's BERA back check, we plan to add the following paragraph to the end of Section 11.3 (i.e., this would be the final paragraph of the BERA).

All compounds with LOAEL-based HQs greater than 1 will be carried into the FS for risk management consideration. HQs are summarized for benthic invertebrates in Tables 6-17 and 6-24, fish in Table 7-24, birds in Table 8-15 and mammals in Table 9-8. These will be considered in the context of the findings and recommendations based on the WOE evaluation in this BERA.

After discussing with you and Chuck, we feel this added language captures the intent of the comment. We will provide a revised BERA with this added language on June 23 for EPA's final review.

Thanks,
Carlie

From: Naranjo, Eugenia <Naranjo.Eugenia@epa.gov>
Sent: Wednesday, June 3, 2020 5:09 PM
To: Thompson, Carlie T <Carlie_Thompson@oxy.com>; Castro, Enrique M <Enrique_Castro@oxy.com>
Cc: len.warner@wsp.com; Franklin, Elizabeth A NWK <Elizabeth.A.Franklin@usace.army.mil>
Subject: [EXTERNAL] Diamond Alkali NBSA BERA back-check comments

Carlie,
Find attached the NBSA back-check comments on the GSH Revised BERA (May, 2020). Let me know if we need to discuss. Thanks

Eugenia Naranjo
United States Environmental Protection Agency

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